

# PATH

## Department of Prevention, Assistance, Transition, and Health Access

BULLETIN NO. 00-19FP

FROM Eileen I. Elliott, Commissioner  
for the Secretary

DATE

SUBJECTS Changes to ANFC Policy, Including Implementation of Transition Period Rules for WRP Group 3 Families with Single Parents and Able-Bodied Spouses of Incapacitated Parents; Application of the Civil Unions Act; and ~~Modification of~~ Modifications of the Exemptions from the Work Requirement, Including the Domestic Violence Exemption from the Work Requirement, the Medical Exemption, and the Exemption for a Parent Needed in the Home to Care for a Relative.

CHANGES ADOPTED EFFECTIVE 11/01/2000

### INSTRUCTIONS

- X Maintain Manual - See instructions below.
- X Proposed Regulation - Retain bulletin and attachments until you receive Manual Maintenance Bulletin: \_\_\_\_\_ Information or Instructions - Retain until \_\_\_\_\_

### MANUAL ~~REFERENCE(S)~~ REFERENCES

T.O.C. 2200 – 2273	2343.63
2208.2	2344.2
T.O.C. 2300 – 2360	2355 - 2356.6

~~This bulletin proposes rules to initiate~~ The adopted rule initiates the change from the Welfare Restructuring Project (WRP) to the new Reach Up Program by modifying the work requirements for Group 3 families with single parents or able-bodied spouses of incapacitated parents during a transition period from November 1, 2000, through June 30, 2001. The changes are part of a more comprehensive welfare reform law that is effective on July 1, 2001. ~~This bulletin also proposes to add~~ The rule also adds a provision that makes the substance of the civil unions act (Act 91) applicable to all ANFC policy. In addition, ~~this bulletin proposes to change~~ the rule changes ANFC policy regarding extensions of domestic violence exemptions from the WRP work requirement by eliminating the requirement that a clinical assessment must accompany each extension request.

### *Transition Period Policy*

In May 2000, the Vermont General Assembly enacted Act 147, an “Act Relating to Assisting Families to Attain Self-Sufficiency.” Act 147 establishes the new Reach Up Program, the program that on July 1, 2001, will replace ANFC and WRP. Although most provisions of Act 147 do not go into effect until July 1, 2001, section 1133 is effective on November 1, 2000. This section establishes a period of

transition from ANFC and WRP to the new Reach Up Program for Group 3 families with single parents and able-bodied spouses of incapacitated parents.

WRP is a seven-year demonstration project that allowed the Department of Social Welfare, now Department of Prevention, Assistance, Transition, and Health Access (department), to establish different policies and apply them to ANFC assistance groups based on their random assignment into one of three groups. This project is operating under the authority of Act 106 (1994) and federal waivers. On the basis of these waivers, Vermont has been exempted from the work participation requirements of the federal Temporary Assistance for Needy Families (TANF) law.

On July 1, 2001, WRP ends, the federal waivers and the applicable provisions of Act 106 expire, and Vermont must comply with the TANF law. This law requires every state receiving a TANF block grant to demonstrate that increasing percentages of their families receiving cash assistance are engaged in federally approved work activities for mandated numbers of hours per week. The federal regulatory agency may assess fiscal penalties against a state and reduce its TANF block grant amount if it fails to meet the federal requirements.

Because Vermont cannot afford to wait until July 1, 2001, to engage families in the current caseload in work activities that meet the federal work requirements, the legislature enacted section 1133 to create a transition period. During the transition period, hours-of-work requirements and work activities are modified for Group 3 families with single parents and able-bodied spouses of incapacitated parents to meet the TANF law requirements.

Potentially, all families receiving ANFC between November 1, 2000, and June 30, 2001, could be affected by the transition period because those months of ANFC receipt may be counted in determining the parents' work-ready dates after June 30, 2001. This policy does not address these possible effects because their direct impact, should it occur, does not happen until after the transition period is over. For the time being, these families will be notified of the upcoming changes by the department's district office staff. Actual work-ready dates and work requirements for all families, other than the Group 3 families affected by this proposed rule, will be addressed in future policy effective July 1, 2001.

This [bulletin proposes rule](#) makes the following changes to implement the section 1133 transition period starting on November 1, 2000:

- Increase the hours-of-work required for Group 3 parents who otherwise would not be meeting their TANF requirement on July 1, 2001.
- Establish case manager meeting and work-ready dates for families directly affected by the transition period.
- Expand the list of acceptable work activities during the transition period to include all TANF-countable activities.
- Establish definitions for the work activities, limited in application to the transition period and subject to further refinement in policy effective July 1, 2001.

### ***Civil Unions Act (Act 91)***

~~This bulletin proposes to add a general rule of application of the civil unions act to ANFC policy. Civil union partners shall be treated as and included in the term “spouse,” and civil unions shall be treated as marriages in applying all ANFC policy, with the exception of Medicaid coverage. Eligibility of civil union partners for Medicaid has yet to be determined. This rule addresses the effect on ANFC policy brought about by changes in Vermont law caused by the civil unions act. The rule focuses on the changes that have expanded the meaning of “parent” and “stepparent” to include partners to a civil union.~~

### ***Domestic Violence Option Exemption***

~~This bulletin also proposes~~The rule changes~~to~~ policy regarding the domestic violence exemption. The domestic violence exemption allows parents whose families are experiencing the effects of domestic violence to be exempted from the WRP work requirement.

The department established the domestic violence exemption by rule, effective April 1, 1999. This rule is an option authorized by federal welfare law, the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA), and adopted by the Vermont General Assembly in its FY 1999 appropriations act.

Pursuant to federal regulations and state policy, the department must review domestic violence exemptions every six months if the parent seeks to retain or extend the exemption. During the process of developing procedures related to these reviews, the department determined that it was unnecessary to require a clinical assessment in every extension request and that elimination of this requirement would make the rule more universal in its application.

Accordingly, this~~proposed~~ rule removes the requirement that a clinical assessment must accompany every request for an extension of the domestic violence exemption. In addition, the ~~proposed~~ rule eliminates unnecessary language in current policy on the domestic violence exemption.

### ***Specific Changes and Additions to Policy Pages***

After filing the final proposed rule and before the hearing of the Joint Legislative Committee on Administrative Rules the department met with representatives from Vermont Legal Aid and agreed to revise several sections of the rule. The revisions were then presented to the Joint Legislative Committee on Administrative Rules at the hearing and approved as part of the adopted rule. These changes are indicated below as occurring “Since the last filing and with the approval of the Joint Legislative Committee on Administrative Rules.”

T.O.C. P.1                      Adds section 2208.2 pertaining to the civil unions act.  
2200 – 2273

2208.1 P.5                      ~~Adds rule explaining application of~~Since the last filing and with the approval of the Joint Legislative Committee on Administrative Rules, the department has changed the language of the section addressing the effect of the civil unions act to policy.  
on ANFC policy. The new language explains how the changes brought about by the civil unions act

expand the ANFC policy terms “parent” and “stepparent” to include all individuals now within those definitions under Vermont law.

T.O.C. P. 4-5 2300 - 2360	Removes language reserving sections 2355 through 2359, adds sections 2355 through 2356.6 pertaining to the transition from Welfare Restructuring Project to new Reach Up Program, and reserves 2357 through 2359.
2343.63	Removes the hours-of-work requirement for parents other than principal earners and adds a notation that the substance of this provision has been moved to 2356.1.
2343.63 P.3	<u>Since the proposed filing</u> , a typographic error has been corrected on this pre-existing policy in the third paragraph changing “2343.63 A 4” to “2343.63 A 5”.
2343.63 P.5	Changes reference to half-time community service employment placement (CSE) to make section consistent with transition period rules.
2343.63 P.6-7	Changes references to hours-of-work requirement and maximum number of hours for self-employed parent to make section consistent with transition period rules.
<u>2344.2 –2344.2 P.2</u>	<u>Since the last filing and with the approval of the Joint Legislative Committee on Administrative Rules, the department has added language to the medical exemption section. The new language is added in three subsections of the medical exemption to clarify that this exemption is available when a parent is incapable of working the total number of hours of the applicable work requirement. This clarification reflects the actual practice of the department.</u>
<u>2344.2 P.3</u>	<u>Since the last filing and with the approval of the Joint Legislative Committee on Administrative Rules, the department has added language to the exemption for parents who are needed in the home full-time to care for a relative. The added language extends the exemption to parents who are needed part-time in the home for the same purpose and creates a partial exemption that permits individuals who qualify to have their work requirement hours modified.</u>
2344.2 P.6	Allows department to extend a domestic violence exemption without a clinical assessment.
2355 – 2356.5	Adds rules for the transition period from WRP to the new Reach Up Program.
2355.2	<u>Since the proposed filing</u> , the words “to satisfy the participant’s work requirement” have been deleted from the definition of “Hours-of-work requirement”.  <u>Since the proposed filing</u> , a grammatical correction has been made to the “work activities” definition.

2356.4 P.2                    Since the proposed filing, section 2356.4(B)(2) has been modified to expand the availability of this work activity when placement in the work activities in 2356.4 (1) –(6) is not available.

2356.4 P.2 – 3                    Since the last filing and with the approval of the Joint Legislative Committee on Administrative Rules, the department has added language to create an option effective only during the transition period and available to parents whose youngest child will turn 18 months old after December 31, 2000. This option gives a parent within this group more flexibility to choose the work activities engaged in to fulfill the work requirement. These parents may engage in any combination of work activities regardless of the parent’s capability or limitation on the work activity.

### ***Summary of Public Hearing and Written Comments***

A public hearing was held on August 14, 2000, at 10:00 a.m., in the Agency of Human Services Secretary’s Conference Room, State Office Complex, Waterbury, Vermont. Three people attended to listen. No one made any comments.

Written comments were received from two advocacy groups, Vermont Legal Aid and Vermont Coalition for Disability Rights. The submitted comments are summarized below.

#### ***General Concerns Expressed by Both Commenters***

- Approach increases the hours-of-work requirement to hours in new program, without including protections of new program.

#### ***General Concerns Expressed by One of the Commenters***

- Regulations do not reference barriers and how families will be assisted in overcoming them.
- Regulations do not reference need for someone to be job-ready prior to requiring that the work requirement be met out of employment.
- Regulations do not meet the goal of the new law as they do not accomplish transitioning parents into the new work requirements outlined in Act 147. For example, the hours-of-work requirement is at either 20 or 30 hours and does not provide for the flexibility of hours allowed in the new Reach Up program.
- Definitions from the new statute are not included in the regulations, even where the same term is used.

*Responses to General Concerns*

The transition period policy is a policy that's effectiveness is limited in time to the period of November 1, 2000, to July 1, 2001. It is a supplemental policy that is to be read and interpreted with the pre-existing policy. The policy is created under the limited authority in Act 147's subsection 1133(d). The section was included to address Vermont's need to be able to meet the federal work participation rates on July 1, 2001. This is accomplished by increasing the hours-of-work requirement for those Group 3 families in the Welfare Restructuring Demonstration Project whose existing requirements do not meet the minimum federal levels. To ease the burden on these families, the activities in which they may engage to fulfill the requirement have been expanded to include all activities allowed under the federal law. To maintain the integrity of the WRP, all other aspects of the program (requirements, protections, and procedures) remain unchanged and in effect for these families.

The legislature uses terms, such as "able-bodied" and "incapacitated," in subsection 1133(d) and specifically states that the families affected by this subsection shall be subject to the existing sanctions and exemptions policies. In contrast, in section 1133(e) and (f), the subsections addressing those affected after Act 147's effective date, the legislature uses the terms "able-to-work," "able-to-work-part-time," "unable-to-work," and "job-ready". In addition, the legislature makes clear that the groups affected in subsections (e) and (f) will be subject to the sanctions section and the deferments and modifications section that are in Act 147. In light of these clear distinctions, the department views its rulemaking authority related to subsection 1133(d) limited to the changes made in the proposed policy.

The transition policy must be read with pre-existing policy; references to the barriers and the methods for overcoming them are addressed there. See WAM 2345.2. "Job-ready" and other terms in Act 147 are not used in the policy because of what the department perceives as the legislature's clear intent to leave those terms for inclusion only after Act 147's effective date. While the term "work-ready" is included in subsection 1133(d) it is not used as it is defined in Act 147. Instead, it is used as a synonym to the current "end of time limits" (ETL) to establish a specific date based on the cumulative number of months of ANFC the family has received.

*Specific Comments by Proposed Regulations' Section*

2343.63(A)(1)(b)

Comment: Language is unclear as to who is receiving the ANFC or SSI, the child or the parent.  
Response: The language at issue is "a single parent with a child at home receiving either ANFC or SSI". The structure and language is substantively the same as has been in place for years at WAM 2343.63(A)(1)(b). The language and structure was maintained to avoid confusion by creating what might appear to be a change in the substance. The phrase means and applies to families in which the child is the recipient of ANFC or SSI.

2344.2

Comment: The modification of the hours-of-work requirement is inconsistent with the hours-of-work exemptions for all other groups. There is no apparent reason to treat the domestic violence exemption differently than any other exemption.

Response: The referenced paragraph reads:

If the department determines that *the parent is able to work fewer hours than his or her hours-of-work requirement, he or she shall be required to work this reduced number of hours*. There is no limit to the number of times the exemption may be extended, as long as the conditions for extending it, described below, are met.

The italicized language regarding the modification of the hours-of-work requirement remains the same as it is in current policy. The change, made at the advocates' request, is the removal of the clinical assessment requirement for every request of an extension of the exemption.

This unchanged hours-of-work modification is consistent with the treatment of medical exemptions at WAM 2344.2(A)(4), which states: "A parent able to work fewer hours than his or her hours-of-work requirement shall be required to work this reduced number of hours.

2355.1

Comment: The second paragraph suggests that the department could determine that someone is work-ready prior to ETL. This is inconsistent with the rest of the regulatory scheme regarding the transition.

Response: Section 2355.1 is the introduction section and is designed to give the reader the broader perspective in which the changes occur. The second paragraph does not address the groups affected in this transition policy. It begins, "Beginning July 1, 2001, under Act 147", and refers to the time after the transition period when Act 147 is effective in full. At that time, the law's definition of "work-ready" will be applicable and participants may be deemed "work-ready" before the end of their time limit. The next paragraph refers to the transition period addressed in the proposed policy and explains that when the "parents reach ETL . . . they will be deemed work-ready."

2355.3

Comment: A. The hours-of-work requirement definition should not reference the "work requirement." The two requirements are the same thing, just different labels. In addition, the term "work requirement" is not defined in the regulation. The sentence could terminate after "work activities."

- B. The definition of work activities should be defined as in Act 147. The regulatory definition does not define the term in a meaningful way. The second sentence is irrelevant and unnecessary as the concept is included in both the statute and in the work activities section.
- C. The “work-ready” definition is inconsistent with the statutory definition in Act 147. The statute suggests that the recipients being transitioned into the new requirements should be deemed ready to engage in work activities at the time specified in the statute. Because this is different from the statutory definition of work-ready, a different term should be used and defined.
- D. Additional definitions are needed to include the protections in the new program. For example, the definition of job-ready should be included.

Response: The commenter’s suggestion is adopted and the sentence is modified so that it ends after “work activities.”

- A. Substantively, the definition of work activities is as is defined in Act 147, but the individual activities are listed in the Work Activities section instead of the definition section. The policy is structured this way in an effort to simplify the policy and make it user-friendly by avoiding the duplication of listing the activities. The second sentence serves the purpose of alerting the reader that the activities may be limited and that they follow the federal law. The department is willing to modify the definition as follows:

“Work activities” means the activities listed at WAM 2356.4 that a participant may engage in to meet the work requirement, but only to the extent they are allowed and countable in accordance with this policy and federal law.

- B. The term “job-ready” is not included in the proposed policy because it is not a term that is included in the subsections of Act 147 that are implemented by this policy. This transition policy addresses only the period from November 1, 2000, through June 30, 2001, and those participants affected during that period (the groups referred to in section 1133(d)). In subsection 1133(d), the legislature uses only the term “work-ready”, although it is used in a manner that is more limited than the Act 147 definition. Other treatment of this group (exemption and sanction policies) is to be in keeping with the rules established under Act 106. Retaining the application of current law and policy wherever possible preserves the integrity of the Welfare Demonstration Project (WRP), which does not expire until June 30, 2001.

In contrast, subsections 1133(e) and (f) address the effects on specified groups after Act 147’s July 1, 2001, effective date. In these sections the legislature refers to terms defined in Act 147, including “work-ready” and “job-ready”. The department interprets this disparate treatment and references to mean that authority to utilize the terminology and concepts of Act 147 is restricted until after the entire law is in effect.

2356.1

Comment: The first sentence is contrary to the actual hours established later. We agree that Act 147 requires the transition program to mirror the work requirement scheme in the new statute. Accordingly, the hours needed to meet the requirement should vary depending on the characteristics of the parent and family as under the new law.

Response: The department cannot read authorizing subsection 1133(d) of Act 147 as requiring the transition period addressed in this policy to mirror the work requirement of the new statute. In fact, the authority is very specific and limited. The effective dates for all sections of Act 147 that the commenter suggests the department should implement do not go into effect until July 1, 2001, when this proposed policy will have expired. Absent legislative direction and authority to the contrary, the department must limit its regulatory authority to areas specified. The legislature's use of terms and descriptive phrases that establish participant and family characteristics such as "able-to-work parents" and "able-to-work-part-time parents and caretakers" are used only in the parts of Act 147 that are either not applicable or not effective until July 1, 2001.

2356.1(1) & (2)

Comment: Again, who receives SSI/ANFC, the child or the parent?

Response: The reference is to the child recipient.

2356.2

Comment: This section is important and necessary; it should be clarified that earlier meetings should occur where at all possible.

Response: Until the Welfare Restructuring Project expires, a participant's involvement in Reach Up is voluntary until two months before the end of the participant's time limit. Procedures are in place to encourage a participant's voluntary participation and meetings with the case manager before they are required. From the time of their initial application for assistance, parents are required to attend an orientation to the Reach Up program and are encouraged to meet with their case manager to develop their FDP goals and to participate in Reach Up activities. In addition, five months before the participants' ETL date, they receive a letter reminding them of their ETL date and that a Reach Up case manager will be contacting them within 30 days to schedule an appointment. The letter is followed up with the call from the case manager, four months before the ETL date.

2356.3

Comment: There is no definition regarding how you calculate cumulative months of ANFC received. The chart implies this calculation is based on receipt after June 30, 1994; this should be specifically stated.

Response: The commenter may be correct that the transition policy may be clearer if it specifically addressed every aspect of the program, including how the work-ready date calculation is made. However, the transition policy is a supplemental policy that will be effective for only eight months. This policy is to be brief. It is to be read and interpreted in combination with pre-existing policy. See 2355.2 of this bulletin. Calculation of the past months of ANFC received should be done with reference to and in accordance with WAM 2343.61 (B) which limits the count to begin no earlier than the first full month of ANFC after the participant's assignment to Group 3. Group 3 assignments did not begin until after June 30, 1994.

#### 2356.4

Comment: 2356.4(A)(7). It would be inappropriate to place a single mother on a Department of Corrections work crew. In addition, it is offensive to correlate a public assistance recipient's work activity to work required of incarcerated criminals.

Response: The department only acknowledges that the judiciary does sentence ANFC recipients to participation on work crews. The department makes no judgment on the appropriateness of the judiciary's sentencing decisions. The policy includes the Department of Corrections' [DOC] work crew as an example of a community service program to inform the reader that the hours of service of a sentence on a DOC work crew may be counted as hours toward meeting the work requirement.

Comment: 2356.4(A)(10) & (11). Why are these activities limited to those without a high school degree or GED?

Response: One of the motivations for implementation of a transition period is that Vermont will be subject to federal work participation rates on July 1, 2001. If Vermont waited until then to raise hours-of-work requirements, the state would have no chance of meeting the requirement and would be subject to fiscal penalties and grant reduction.

It is essential that the work activities engaged in meet with federal approval. This is the reason why the work activities are defined in section 2355.3 and limited in 2356.4 "only to the extent and degree that they are allowed and countable in accordance with . . . Part A of Title IV of the Social Security Act." Section 407 of Part A of Title IV of the Social Security Act [42 U.S.C. § 607] allows the activities in 2356.4(A)(10) and (11) to be counted only for individuals who are without a high school degree or GED.

Comment: 2356.4(A)(12). Why is child care limited to care for children whose parents are in a community service program? Why does it matter why the parent needs child care?

Response: As addressed in the previous response, work activities are as limited by the federal law. Section 407 of Part A of Title IV of the Social Security Act [42 U.S.C. § 607] only allows the provision of child care services to be counted if it is for an individual who is participating in a community service program.

Comment: 2356.4(B)(1). This section should specify that the types of work activities engaged in to meet the hours-of-work requirement should be decided with significant input by the family. Why are (9) through (11) limited to hours beyond 20 spent in other activities?

Response: As addressed in the previous responses, work activities are as limited by the federal law. Section 407(c) of Part A of Title IV of the Social Security Act [42 U.S.C. § 607(c)] establishes the activities that may be counted as engaged in work for purposes of the federal work participation rate. A recipient who has a minimum hours-of-work requirement of 30 hours must participate in not fewer than 20 hours per week in the activities listed in 2356.4 (1) through (8) and (12).

Comment: 2356.4(B)(1). What is meant by the “participant’s highest level of capability”? What assessment tools will be used? Who will determine this?

Response: The reference to the “participant’s highest level of capability” is in keeping with the current policy and procedures which remain in effect. Generally, able-bodied participants approaching ETL or their work-ready date are directed to job search. A participant must accept an offer of unsubsidized employment that the participant is capable of performing. If unsubsidized employment is unavailable, participants are referred to community service employment. If neither of these activities is available, the participant may engage in other allowable work activities consistent with the FDP.

The FDP is created with full involvement of the family and describes the goals, tasks, services and timeframes for the Reach Up participant(s) to complete the FDP and for the family to achieve long-term independence from welfare. The FDP must identify the employment goal of the Reach Up participant(s). This goal is supported in the plan by specified program activities, support services and any other actions appropriate to its attainment. WAM 2345.3.

Comment: 2356.4(B)(2). Why limit participation in a community service program only because of family or personal circumstances? What if the participant can only find a job for 15 hours a week, but could volunteer for another 5 hours to make up the requirement? There should be more flexibility.

Response: A primary goal of the Welfare Restructuring Project and Act 147 is to assist families to gain the skills needed to attain self-sufficiency. Participants must engage in work activities that are consistent with their employment goals outlined in the family development plan. While it is possible that the participant in the example could perform the additional five hours of the work requirement in a community service program, it would not be the first option. Because the participant is already demonstrating an ability to maintain paid employment, she would need to spend the additional five hours in an activity that furthers her self-sufficiency, such as subsidized employment, a work experience placement, or skills training. The community service program would be an option only if the participant is unable to engage in the activities in 2356.4(1)-(6) due to personal or family circumstances that prevent such participation or if placement in those activities is not available. The department has modified 2356.4(B)(2) to include situations where placement in the other activities is not available.

2208.1 P.5

**Comment:** One commenter questions the department's decision to treat civil unions as equivalent to marriages for ANFC policy purposes with the exception of Medicaid coverage, citing the cover sheet statement that "eligibility of civil union partners for Medicaid has yet to be determined". The commenter noted that her organization is not aware of any reason for treating the two programs differently.

**Response:** The department is not suggesting that the two programs will be treated differently. The department intends that Medicaid benefits will be provided to civil union partners in a manner consistent with the requirements of the civil unions act, even if the benefits must be paid solely with state funds.

The ANFC, now TANF, program allows the states receiving federal TANF block grants to choose how they want to define family. This flexibility permits the easy incorporation of the application of the civil unions act into ANFC/TANF policy. The Medicaid program does not have the same flexibility. More time is needed to research the best method of modifying policy to comply with the civil unions act without running afoul of the federal Medicaid and Defense of Marriage laws.

Vertical lines in the left margin indicate significant changes. Dotted lines at the left indicate changes to clarify, rearrange, correct references, etc., without changing regulation content.

**MANUAL MAINTENANCE**

MANUAL HOLDERS: Please maintain manuals assigned to you as follows.

Special Note: All the pages in this bulletin have been included in the final version due to an incorrect header. You may discard 00-19P.

<u>Remove</u>		<u>ANFC Policy</u>		<u>Insert</u>
TOC P.1 (2200-2238)	(98-20F)		TOC P.1 (2200-2238)	(00-19)
2208.1 P.5	(97-36)		2208.1 P.5	(00-19F)
Nothing			2208.2	(00-19F)
TOC P.4 (2340-2359)	(98-1F)		TOC P.4 (2340-2359)	(00-19)
Nothing			TOC P.5	(00-19)
2343.63	(99-12)		2343.63	(00-19)
2343.63 P.2	(98-1F)		2343.63 P.2	(00-19)
2343.63 P.3	(98-1F)		2343.63 P.3	(00-19)
2343.63 P.5	(99-12)		2343.63 P.5	(00-19)
2343.63 P.6	(99-12)		2343.63 P.6	(00-19)
2343.63 P.7	(99-12)		2343.63 P.7	(00-19)
2344.2	(98-1)		2344.2	(00-19F)
2344.2 P.2	(98-1)		2344.2 P.2	(00-19F)
2344.2 P.3	(98-1)		2344.2 P.3	(00-19F)
2344.2 P.6	(98-20F)		2344.2 P.6	(00-19)
Nothing			2355	(00-19)
Nothing			2355.2	(00-19)
Nothing			2356.1 P.2	(00-19)
Nothing			2356.3 P.2	(00-19)
Nothing			2356.4 P.2	(00-19F)
Nothing			2356.4 P.3	(00-19F)